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11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 COALITION FOR HUMANE
IMMIGRANT RIGHTS, *ET AL.*,

15 Plaintiffs,

16 v.

17 UNITED STATES CITIZENSHIP AND
18 IMMIGRATION SERVICES,
DEPARTMENT OF HOMELAND
19 SECURITY,

20 Defendant.

No. CV 18-08034 GW (MRWx)

NOTICE OF FILING VAUGHN INDEX

Honorable George H. Wu
United States District Judge

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22 Please take notice that, in accordance with the Court's Orders (Docket Nos. 54,
23 56), attached for filing is Defendant's Declaration of Jill A. Eggleston, Assistant Center
24 Director in the Freedom of Information and Privacy Act ("FOIA/PA") Unit, National
25 Records Center ("NRC"), United States Citizenship and Immigration Services
26 ("USCIS"). This Declaration describes, generally, agency procedures for processing
27 FOIA requests for access to agency records and, more specifically, agency action taken
28 in response to the Plaintiffs' FOIA request in this case. In addition, the Declaration

1 makes reference to and incorporates attachments A through G, including a *Vaughn*
 2 index¹ that describes: (1) the records USCIS produced to Plaintiffs in response to their
 3 FOIA request; (2) the records that were withheld in part; and (3) the bases, pursuant to
 4 FOIA, that justify their exemption from disclosure. *See* Attachment G. The Declaration,
 5 attachments and index, comprise Defendant's *Vaughn* index.

6 As set forth in the *Vaughn* index, some information was withheld from disclosure,
 7 pursuant to one or more of the following FOIA Exemptions: 5, 6, and 7(C). *See* 5 U.S.C.
 8 §§ 552(b)(5), (6), and 7(C). In accordance with the Court's Order, the parties will meet
 9 and confer to determine what continuing objections, if any, the Plaintiffs have following
 10 the filing of this *Vaughn* index. Thereafter, should any issues remain in dispute,
 11 Defendant intends to address those issues as part of a contemplated Motion for Summary
 12 Judgment.

13 Dated: October 16, 2020

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22 /s/ Alarice M. Medrano

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¹ A *Vaughn* index is a document that is prepared in litigation to justify withholding
 of information under the FOIA. The term arose from the case of *Vaughn v. Rosen*, 484
 F.2d 820, 823-25 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974), in which such an
 index was required to determine the validity of the agency's withholdings. *See also*
Yonemoto v. Dep't of Veterans Affairs, 686 F.3d 681, 688 (9th Cir. 2012) (describing
 requirements for *Vaughn* Index).